## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Larnelon Shipping Ltd.,	§
	§
Plaintiff,	§
	§ CIVIL ACTION
VS.	§
	§ IN ADMIRALTY, Rule 9(h)
Lord Energy SA,	§
	§
Defendant,	§
	§
and	§
	§
Repsol Trading SA,	§
	§
Garnishee.	§

## MOTION FOR APPOINTMENT FOR SERVICE OF PROCESS OF MARITIME GARNISHMENT

Plaintiff hereby moves, pursuant to Fed. R. Civ. P. Rule 4(c)(2), to appoint J. Stephen Simms or any other qualified person appointed by him to serve process of maritime garnishment and any supplemental process in this matter.

As grounds for this motion, Plaintiff states that service of the maritime garnishment writs issued in this case will be straightforward, on garnishees located in this District. Garnishees will be served via their respective Resident Agents as set forth on Attachment A hereto. Utilizing private process service will conserve the resources of the United States Marshal. Plaintiff will, upon service, promptly cause returns of service to be filed in this case.

WHEREFORE, Plaintiff respectfully requests this Court to grant this motion and

herewith submits a draft order

Dated: May 29, 2019.

Respectfully Submitted,

/s/ J. Stephen Simms

J. Stephen Simms (pro hac vice pending) Simms Showers LLP 201 International Circle, Suite 250 Baltimore, Maryland 21030 Telephone: (410) 783-5795

Facsimile: (410) 510-1789 jssimms@simmsshowers.com

Attorneys for Larnelon Shipping Ltd.

## **ATTACHMENT A**

## Garnishee

Repsol Trading SA 2455 Technology Forest Boulevard The Woodlands, TX 77381